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9

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 DONALD WALDEN, JR., et al., etc.,

13 Plaintiffs,

14 v.

15 THE STATE OF NEVADA, EX REL. NEVADA
DEPARTMENT OF CORRECTIONS, and
16 DOES 1-50,

17 Defendants.

CASE NO: 3:14-cv-00320-MMD-WGC

**EXHIBITS TO DEFENDANT STATE OF
NEVADA *EX REL.* DEPARTMENT OF
CORRECTIONS' MOTION TO EXCLUDE
ALL EVIDENCE FROM PLAINTIFFS'
EXPERTS, THE EMPLOYMENT
RESEARCH CORPORATION,
MALCOLM COHEN, AND LAURA
STEINER**

18 Defendant The State of Nevada, *ex rel.* Nevada Department of Corrections ("NDOC"), by
19 and through its counsel, hereby submits the exhibits to its motion to exclude the testimony of
20 Plaintiffs' experts, the Employment Research Corporation ("ERC") and its principals Malcolm
21 Cohen, Ph.D. and Laura Steiner.

22 DATED this 9th day of April, 2020.

23 **WILSON ELSE MOSKOWITZ**
24 **EDELMAN & DICKER LLP**

25 BY: /s/ James Tucker

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CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP and that on the 9th day of April, 2020, I electronically filed and served a true and correct copy of the foregoing **EXHIBITS TO DEFENDANT STATE OF NEVADA *EX REL.* DEPARTMENT OF CORRECTIONS' MOTION TO EXCLUDE ALL EVIDENCE FROM PLAINTIFFS' EXPERTS, THE EMPLOYMENT RESEARCH CORPORATION, MALCOLM COHEN, AND LAURA STEINER** to all parties on file with the CM/ECF:

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